



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

March 18, 2015

Cheryl Wagner  
Wagner Regulatory Associates  
P.O. Box 640  
7227 Lancaster Pike, Suite A  
Hockessin, Delaware 19707

Authorized Agent for Rotam Limited

Subject: Label Amendment – Additional me-too use for companion animals  
Product Name: Rotam Imidacloprid Technical  
EPA Registration Number: 81598-5  
Application Date: 12/26/2014  
Decision Number: 498957

Dear Ms. Wagner:

The amended label referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable. This approval does not affect any conditions that were previously imposed on this registration. You continue to be subject to existing conditions on your registration and any deadlines connected with them.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. You must submit one copy of the final printed labeling before you release the product for shipment with the new labeling. In accordance with 40 CFR 152.130(c), you may distribute or sell this product under the previously approved labeling for 18 months from the date of this letter. After 18 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. "To distribute or sell" is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR 152.3.

Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance.

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Your release for shipment of the product constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6. If you have any questions, please contact Rita Kumar by phone (703) 308-8291, or via email at [kumar.rita@epa.gov](mailto:kumar.rita@epa.gov).

Sincerely,

A handwritten signature in black ink, appearing to read 've', followed by a horizontal line extending to the right.

Venus Eagle, Product Manager 01  
Invertebrate & Vertebrate Branch 3  
Registration Division (7505P)  
Office of Pesticide Programs

Enclosure

**Rotam Imidacloprid Technical**  
For Formulation Use Only

<b>ACTIVE INGREDIENT:</b>	
IMIDACLOPRID* .....	98.0%
<b>OTHER INGREDIENTS:</b> .....	2.0%
<b>TOTAL:</b> .....	100.0%

\*(CASRN: 138261-41-3)

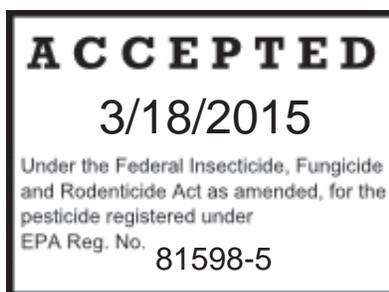
**KEEP OUT OF REACH OF CHILDREN**  
**WARNING**

<b>FIRST AID</b>	
<b>If Swallowed</b>	<ul style="list-style-type: none"> <li>• Call poison control center or doctor immediately for treatment advice.</li> <li>• Have person sip a glass of water if able to swallow.</li> <li>• Do not induce vomiting unless told to do so by a poison control center or doctor.</li> <li>• Do not give anything to an unconscious person.</li> </ul>
<b>If Inhaled</b>	<ul style="list-style-type: none"> <li>• Move person to fresh air.</li> <li>• If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth, if possible.</li> <li>• Call poison control center or doctor for treatment advice.</li> </ul>
<b>If On Skin Or Clothing</b>	<ul style="list-style-type: none"> <li>• Take off contaminated clothing.</li> <li>• Rinse skin immediately with plenty of water for 15-20 minutes.</li> <li>• Call a poison control center or doctor for further treatment advice</li> </ul>
<b>If In Eyes</b>	<ul style="list-style-type: none"> <li>• Hold eye open and rinse slowly and gently with water for 15-20 minutes.</li> <li>• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.</li> <li>• Call a poison control center or doctor for further treatment advice.</li> </ul>
<b>NOTE TO PHYSICIAN:</b> No specific antidote. Treat symptomatically.	
<b>HOT LINE NUMBER</b>	
Have the product container or label with you when calling a poison control center or doctor or going for treatment.	
<b>For emergency information, call your local poison control center for assistance.</b>	

SEE ADDITIONAL PRECAUTIONARY STATEMENTS ON LABEL.

**EPA Reg. No. 81598-5****EPA Est. No.**

**Manufactured By:**  
Rotam Limited  
26/F, E-Trade Plaza  
24 Lee Chung Street  
Chai Wan, Hong Kong

**Net Weight:** \_\_\_\_ pounds

**PRECAUTIONARY STATEMENTS****Hazardous to Humans and Domestic Animals**

**WARNING.** May be fatal if swallowed. Do not breathe dust or vapor. Do not get in eyes, on skin or on clothing. Wash thoroughly with soap and warm water after handling and before eating, drinking or using tobacco products or using the toilet. Remove contaminated clothing and wash before reuse.

**ENVIRONMENTAL HAZARDS**

This product is highly toxic to aquatic invertebrates. Keep out of lakes, streams or ponds. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and permitting authority has been notified in writing prior to the discharge. Do not discharge effluent containing the product to sewer system without previously notifying the local sewage treatment plant authority. For guidance contact your local state water board or regional office of the EPA.

**DIRECTIONS FOR USE**

It is a violation of federal law to use this product in a manner inconsistent with its labeling.

**INSTRUCTIONS TO FORMULATORS:** This technical product may be used for the manufacture of end use products for the following uses:

Formulators using this product are responsible for obtaining Environmental Protection Agency Registration for their formulated products.

**TERRESTRIAL FOOD CROPS (Including Domestic Food):****FIELD CROPS**

Cotton, Potato (including Seed Piece Treatment), Tobacco

**VEGETABLE and SMALL FRUIT CROPS (Field and Planthouse)****CUCURBIT VEGETABLES Crop Group**

Chayote (fruit), Chinese waxgourd (Chinese preserving melon), Citron melon, Cuban pumpkin, Cucumber, Gherkin, Gourd (edible, includes hyotan, cucuzza, hechima, Chinese okra), *Momordica* spp. (includes balsam apple, balsam pear, bitter melon, Chinese cucumber), Muskmelon (hybrids and/or cultivars of *Cucumis melo* including true cantaloupe, cantaloupe, casaba, Crenshaw melon, golden pershaw melon, honeydew melon, honey balls, mango melon, Persian melon, pineapple melon, Santa Claus melon, snake melon and Winter melon), Pumpkin, Squash (includes summer squashes: butternut squash, calabaza, crookneck squash, Hubbard squash, scallop squash, straightneck squash, vegetable marrow and zucchini, and winter squashes: acorn squash and spaghetti squash), Watermelon (includes hybrids and/or varieties of *Citrullus lanatus*)

**HERBS**

Angelica, Balm (lemon balm), Basil (fresh and dried), Borage, Burnet, Camomile, Catnip, Chervil (dried), Chinese chive, Chive, Clary, Coriander (cilantro or Chinese parsley leaves), Costmary, Cilantro (leaf), Curry (leaf), Dillweed, Horehound, Hyssop, Lavender, Lemongrass, Lovage (leaf), Marigold, Marjoram, Nasturtium, Parsley (dried), Pennyroyal, Rosemary, Rue, Sage, Savory (summer and winter), Sweet bay (bay leaf), Tansy, Tarragon, Thyme, Wintergreen, Woodruff, Wormwood

**GREENHOUSE VEGETABLES (Mature plants in production greenhouses)**

Cucumber and Tomato only

**FRUITING VEGETABLES (Field and Planthouse)**

Eggplant, Ground cherry, Okra, Pepper (including bell, chili, cooking, pimento and sweet), Tomato, Pepinos, Tomatillo

**BRASSICA (Cole) LEAFY VEGETABLES**

Broccoli, Broccoli raab (*rapini*), Brussels sprouts, Cabbage, Cauliflower, Cavalo broccoli, Chinese (*gai lon*) broccoli, Chinese (*bok choy*) cabbage, Chinese (*napa*) cabbage, Chinese mustard (*gai choy*) cabbage, Collards, Kale, Kohlrabi, Mizuna, Mustard greens, Mustard spinach, Rape greens, Turnip

**LEAFY GREEN VEGETABLES**

Amaranth (leafy amaranth, Chinese spinach, tampala), Arugula (Roquette), Chervil, Chrysanthemum (edible leaved and garland), Corn salad, Cress (garden), Cress (upland, yellow rocket, winter cress), Dandelion, Dock (sorrel), Endive (escarole), Lettuce (head and leaf), Orach, Parsley, Purslane (garden and winter), Raddicchio (red chicory), Spinach (including New Zealand and vine (Malabar spinach, Indian spinach)), Watercress (commercial production only, applications must not be made to native cress growing in streams or other bodies of water), Watercress (upland)

**LEAFY PETIOLE VEGETABLES**

Cardoon, Celery, Celtuce, Chinese celery (fresh leaves and stalk only), Florence fennel (including sweet anise, sweet fennel, Finocchio), Rhubarb, Swiss chard

**LEGUME VEGETABLES (Edible Podded and Succulent Shelled Pea and Bean and Dried Shelled Pea and Bean)**

Bean (*Lupinus* spp.: grain lupin, sweet lupin, white lupin, and white sweet lupin). Bean (*Phaseolus* spp.: field bean, kidney bean, lima bean, navy bean, pinto bean, runner bean, snap bean, tepary bean, wax bean). Bean (*Vigna* spp.: adzuki bean, asparagus bean, blackeyed pea, catjang, Chinese longbean, cowpea, Crowder pea, moth bean, mung bean, rice bean, Southern pea, urd bean, yardlong bean). Pea (*Pisum* spp., includes dwarf pea, edible-pod pea, English pea, field pea, garden pea, green pea, snow pea, sugar snap pea). Other Beans and Peas [Broad bean (fava), Chickpea (garbanzo bean), Guar, Jackbean, Lablab bean (hyacinth bean), Lentil, Pigeon pea, Soybean, Sword bean]

**PEANUT****ROOT, TUBEROUS, and CORM VEGETABLES**

Arracacha, Arrowroot, Artichoke (Chinese and Jerusalem), Beet (garden), Burdock (edible), Canna (edible, Queensland arrowroot), carrot, Cassava (bitter & sweet), Celeriac, Chayote (root), Chervil (turnip-rooted), Chickory, Chufa, Dasheen (taro), Ginger, Ginseng, Horseradish, Leren, Parsley (turnip-rooted), Parsnip, Radish, Oriental radish (diakon), Rutabaga, Salsify (black), Salsify (oyster plant), Salsify (Spanish), Skirret, Sweetpotato, Tanier (cocoyam), Tumeric, Turnip, Yam bean (jicama, manioc pea), Yam (true)

**ANNUAL AND PERENNIAL CROPS**

Cranberry, Globe Artichoke, Hops, Strawberry, Sugarbeet

**TREE, BUSH, and VINE CROPS**

Bushberry (Blueberry, Currant, Elderberry, Gooseberry, Huckleberry, Juneberry, Ligonberry, Salal), Grape (American bunch grape, Muscadine grape and Vinifera grape)

**BANANA and PLANTAIN**

**CANEBERRY****COFFEE****CITRUS (Field and Containerized)**

Calamondin, Citrus citron, Citrus hybrids (chironja, tangelo, and tangor), Grapefruit, Kumquat, Lemon, Lime, Mandarin (tangerine), Pummelo, Orange (sweet and sour), Satsuma mandarin, White sapote (*Casimiroa* spp.), and other cultivars and/or hybrids of these

**POME FRUIT**

Apple, Crabapple, Loquat, Mayhaw, Pear (includes Oriental pear), Quince

**POMEGRANATE****TREE NUTS (except Almond)**

Beechnut, Brazil nut, Butternut, Cashew, Chestnut, Chinquapin, Filbert, Hickory nut, Macadamia nut, Pecan, Pistachio, Walnut [black and English]

**STONE FRUIT**

Apricot, Cherry (includes sweet and tart), nectarine, Peach, Plum (includes Chickasaw, Damson and Japanese), Plumcot, Prune (fresh and dried)

**TROPICAL FRUIT**

Acerola, Atemoya, Avocado, Birida, Black sapote, Canistel, Cherimoya, Custard apple, Feijoa, Jaboticaba, Guava, Llama, Longan, Lychee, Mamey sapote, Mango, Papaya, Passionfruit, Persimmon, Pulasan, Rambutan, Sapodilla, Soursop, Spanish lime, Star apple, Starfruit, Sugar apple, Wax jambu

**OUTDOOR RESIDENTIAL CROPS (For use only in and around commercial and residential areas):**

Pome Fruits, Apple, Crabapple, Grapes, Loquat, Mayhaw, Pear, Pear (oriental), Quince, Pecans

**TERRESTRIAL NON-FOOD CROP (INCLUDING DOMESTIC OUTDOOR):****NURSERY (Commercial), ORNAMENTALS (trees, shrubs, evergreens, flowers, foliage plants, ground covers)**

Includes field grown and plants grown in benches, shade houses, beds, containers (Incl. flats); woody and herbaceous species; INTERIORSCAPES; PLANTSCAPES (Including domestic residential plantings); INDUSTRIAL SITES, LAWN and TURF GRASSES

**FORESTRY:****FOREST and FOREST NURSERIES (Includes forest trees and forest nursery floor weeds)**

Christmas tree, Cotton wood, Poplar (Includes members of the genus *Populus* grown for pulp or timber)

**GREENHOUSE FOOD CROPS:**

NURSERY and VEGETABLE PLANTS (Field grown and plants grown in benches, beds, containers (including flats))

**GREENHOUSE NON-FOOD CROPS:****NURSERY ORNAMENTAL, FLOWERS, GROUND COVERS, INTERIORSCAPES,**

**PLANTSCAPES** (Includes field grown or plants grown in benches, beds, containers (including flats), woody and herbaceous species)

**DOMESTIC INDOOR/OUTDOOR:****WOOD and WOOD STRUCTURE PROTECTION**

Pre-construction and post-construction termiticide use

**RESIDENTIAL INDOOR/OUTDOOR and DOMESTIC INDOOR/OUTDOOR:** Companion Animals**STORAGE AND DISPOSAL**

Do not contaminate water, food or feed by storage or disposal.

**PESTICIDE STORAGE:** Store Rotam Imidacloprid Technical in a cool, dry place away from food, drink, and feeding. If spilled, do not flush to waterways (see Environmental Hazards). Carefully collect and containerize spilled material in a manner that produces the least amount of airborne dust. Suitable protective equipment should be worn during any spill cleanup operation (see Precautionary Statements).

**PESTICIDE DISPOSAL:** Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of federal law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

**CONTAINER DISPOSAL:**

Refillable container. Refill this container with pesticide only. Do not reuse this container for any other purpose. Cleaning the container before final disposal is the responsibility of the person disposing of the container. Cleaning before refilling is the responsibility of the refiller. To clean the container before final disposal, completely empty liner by shaking and tapping sides and bottom to loosen clinging particles. Empty residue into application equipment or a mix tank. Return to point of sale or offer for recycling if available or dispose of in a sanitary landfill, or by incineration. If drum is contaminated and cannot be reused, dispose of it in the manner required for its liner.

**EMERGENCY RESPONSE:** For 24 hour emergency information regarding spills, leaks, exposure, or accidents, call: CHEMTREC 1-800-424-9300.

**CONDITIONS OF SALE AND LIMITATION OF WARRANTY AND LIABILITY**

**NOTICE:** Read the entire Directions for Use and Conditions for Sale and Limitation of Warranty and Liability before buying or using this product. If the terms are not acceptable, return the product at once, unopened, and the purchase price will be refunded.

The Directions for Use of this product must be followed carefully. It is impossible to eliminate all risks inherently associated with the use of this product. Crop injury, ineffectiveness or other unintended consequences may result because of such factors as manner of use or application, weather or crop conditions, presence of other materials or other influencing factors in the use of this product, which are beyond the control of ROTAM LIMITED or Seller. To the extent consistent with applicable law, the Buyer and User shall assume all such risks, and Buyer and User agree to hold ROTAM LIMITED and Seller harmless for any claims relating to such factors.

ROTAM LIMITED warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated in the Directions for Use, subject to the inherent risks referred to above, when used in accordance with directions under normal use conditions. This warranty does not extend to the use of the product contrary to proper instructions, or under abnormal conditions or under conditions not reasonably foreseeable to or beyond the control of Seller or ROTAM LIMITED and Buyer and User assume the risk of any such use. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW ROTAM LIMITED MAKES NO WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR NEITHER A PARTICULAR PURPOSE NOR ANY OTHER EXPENSES OR IMPLIED WARRANTY EXCEPT AS STATED ABOVE.

To the extent consistent with applicable law, ROTAM LIMITED or Seller shall not be liable for any incidental, consequential or special damages resulting from the use or handling of this product. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW THE EXCLUSIVE REMEDY OF THE USER OR BUYER, AND THE EXCLUSIVE LIABILITY OF ROTAM LIMITED AND SELLER FOR ANY AND ALL CLAIMS, LOSSES, INJURIES OR DAMAGES (INCLUDING CLAIMS BASED ON BREACH OF WARRANTY, CONTRACT, NEGLIGENCE, TORT, STRICT LIABILITY OR OTHERWISE) RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, SHALL BE THE RETURN OF THE PURCHASE PRICE OF THE PRODUCT OR, AT THE ELECTION OF ROTAM LIMITED OR SELLER, THE REPLACEMENT OF THE PRODUCT.

ROTAM LIMITED and Seller offer this product, and Buyer and User accept it, subject to the foregoing conditions of sales and limitations of warranty and of liability, which may not be modified except by written agreement signed by a duly authorized representative of ROTAM LIMITED.

Registered: October 26, 2007